

Remarks

This Amendment is in response to the Office Action mailed October 25, 2002. In the Office Action, the Examiner rejected claims 1-32 under 35 U.S.C. § 102(e). Claims 1-32 remain pending in the application. Reconsideration in light of the amendments and remarks made herein is respectfully requested.

Rejection Under 35 U.S.C. § 102

2. The Examiner rejects claims 1-32 under 35 U.S.C. § 102(e) as being anticipated by Rekhter et al. (U.S. Pat. No. 6,339,595).

Applicants respectfully traverse.

As to claims 1, 8, 16, 21, and 26, the Examiner asserts that Figure 1 of Rekhter teaches "the router PE1 with a port for receiving a packet with a header and payload; the PE1 router includes [a] plurality of tables (See col. 4, lines 6-10), the PE router inherently includes a processor for routing (See col. 6, lines 51+); wherein the modified label is between PE1 (first edge router), P1 (backbone router), and PE2 (second edge router) of fig 1."

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Applicants submit that Rekhter fails to teach or suggest every limitation of claims 1, 8, 16, 21, and 26.

As to claim 1, the Examiner has not specifically indicated where Rekhter et al. teaches a router comprising:

- "a) a first port for receiving a packet having a first label, a header and a payload;
- b) **a first table, from among one or more separate tables associated with different labels, associated with the first label;** and
- c) a processor for processing the packet in accordance with the first table." [emphasis added]

While the Examiner noted that Rekhter discloses a router that includes a plurality of tables (See col. 4, lines 6-10), Applicants submit that Rekhter does not teach or suggest distinct tables associated with distinct labels as claimed. As a result, Applicants submit that claim 1 is patentable over Rekhter.

As to claim 8, the Examiner has not specifically indicated where Rekhter teaches a method comprising:

- "a) maintaining **a first table corresponding to a first virtual private network;**
- b) maintaining **a second table corresponding to a second virtual private network;** and
- c) routing a packet based on **a pre-existing association** with the first table or the second table." [emphasis added]

While the Examiner noted that Rekhter discloses a router that includes a plurality of tables (See col. 4, lines 6-10), Applicants submit that Rekhter does not teach or suggest distinct tables corresponding to distinct virtual private networks as claimed. Additionally, Applicants submit that Rekhter also does not teach that

packets are routed based on a pre-existing association with a table as claimed. As a result, Applicants submit that claim 8 is patentable over Rekhter.

As to claim 16, the Examiner has not specifically indicated where Rekhter teaches a method of routing in a network comprising:

- "a) maintaining a **first forwarding table corresponding to a first virtual private network**;
- b) maintaining a **second forwarding table corresponding to a second virtual private network**; and
- c) **routing a packet based on a pre-existing association with the first forwarding table or the second forwarding table.**"
[emphasis added]

While the Examiner noted that Rekhter discloses a router that includes a plurality of tables (See col. 4, lines 6-10), Applicants submit that Rekhter does not teach or suggest distinct tables corresponding to distinct virtual private networks as claimed. Additionally, Applicants submit that Rekhter also does not teach that packets are routed based on a pre-existing association with a table as claimed. As a result, Applicants submit that claim 16 is patentable over Rekhter.

As to claim 21, the Examiner has not specifically indicated where Rekhter teaches a network comprising:

- "a) a first edge router configured to receive a packet having a header and to transmit into a wide area network cloud a modified packet having a label and the header;
- b) a backbone router configured to receive the modified packet and route the modified packet based on **a route table associated solely with the label, from among one or more separate route tables associated with different labels**; and
- c) a second edge router configured to receive the modified packet." [emphasis added]

While the Examiner noted that Rekhter discloses a router that includes a plurality of tables (See col. 4, lines 6-10), Applicants submit that Rekhter does not teach or suggest distinct route tables associated with distinct labels as claimed. As a result, Applicants submit that claim 21 is patentable over Rekhter.

As to claim 26, the Examiner has not specifically indicated where Rekhter teaches a method for routing a packet comprising:

- "a) identifying, by a label, a packet including the label, a header and a payload destined for a virtual private network (VPN);
- b) Identifying, from the label, a routing table associated with the VPN *from among multiple separate routing tables associated with different labels*; and
- c) facilitating routing of the packet to the VPN." [emphasis added]

While the Examiner noted that Rekhter discloses a router that includes a plurality of tables (See col. 4, lines 6-10), Applicants submit that Rekhter does not teach or suggest distinct tables associated with distinct labels as claimed. As a result, Applicants submit that claim 26 is patentable over Rekhter.

As a result of their dependence on the patentably distinct independent claims 1, 8, 16, 21, and 26, Applicants submit that dependent claims 2-7, 9-15, 17-20, 22-25, and 27-32 are also in condition of allowance.

In light of the remarks made, Applicants respectfully request that the Examiner withdraw the rejection of claims 1-32 under 35 U.S.C. § 102(e) as being anticipated by Rekhter et al. (U.S. Pat. No. 6,339,595).

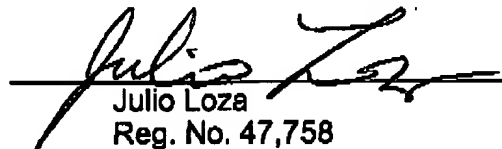
Conclusion

In view of the amendments and remarks made above, it is respectfully submitted that the pending claims are in condition for allowance, and such action is respectfully solicited.

Respectfully submitted,

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